

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 05-00189-01 DAE
)	
Plaintiff,)	DECLARATION OF COUNSEL
)	
vs.)	
)	
KEITH SEICHI IMAI,)	
)	
Defendant.)	
_____)	

DECLARATION OF COUNSEL

I, CHRIS A. THOMAS, hereby declare as follows:

1. That I am an Assistant U.S. Attorney representing the United States of America in the above-captioned case; and

2. That the above-referenced case is currently set for trial on October 31, 2006.

3. A trial is currently ongoing before the Honorable David Alan Ezra in United States vs. Michael Furukawa, et al., Cr. No. 04-00243 DAE.

4. A communication with the courtroom deputy, in the presence of Defendant's counsel, Myles Breiner, on October 17, 2006, indicated that the above-listed case currently in trial was highly probable to continue into the starting date of the instant case. A date of November 21, 2006 was discussed with counsel as the next available date for trial.

5. The government has several witnesses attending from the mainland and the Big Island of Hawaii, based on that

representation, travel arrangements were rescheduled in order to coordinate travel for the next available date of November 21, 2006.

6. Counsel for the government was informed on November 17, 2006, by counsel for Defendant that the trial date would not be continued by agreement.

7. In order to confirm the next available date for trial the government respectfully requests that the trial in this case be continued to November 21, 2006, based on the availability of the Court.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED: HONOLULU, HAWAII: October 20, 2006.

/s/ Chris A. Thomas
CHRIS A. THOMAS